



Dear State Water Resources Control Board:

Regarding the Bay Delta Plan Substitute Environmental Document, the proposed February through June flow requirements of only 35% of unimpaired flow for the Merced, Tuolumne and Stanislaus Rivers is not adequate for fish and wildlife. Your own 2010 report "Development of Flow Criteria for the Sacramento-San Joaquin Delta Ecosystem" determined that approximately 60% of unimpaired flow between February and June would be necessary to be fully protective of fish and wildlife in the lower San Joaquin River and its three major tributaries. As you know, Low river flows impede fish passage, concentrate pollutants, raise water temperatures and decrease dissolved oxygen. More water is necessary to restore the salmon population, a keystone species, providing food for other animals and transporting nutrients from the ocean to upland habitats. More than 100 species depend on salmon. Furthermore, the commercial salmon fishery in California is on the brink. While there used to be 10,000 commercial fishing permits, now there are fewer than 2,000, and in 2008 and 2009 the commercial salmon fishing season had to be canceled. Please correct this deficiency in the SED.

Let's require water efficient irrigation practices, and replacing lower-value, water-intensive crops with higher-value, water-efficient crops, so more food can be grown with less water.

Thank you,

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